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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the matter of )  
 )  
Replacement of Part 90 )  
by Part 88 to Revise ) PR Docket 92-235  
the Private Land Mobile )  
Radio Services and Modify )  
the Policies Governing them )

To: The Commission

COMMENT OF

Goodwill Hose Company Number 3 submits its comments to the Commission's Notice of Proposed Rule Making in this proceeding.

1. Goodwill Hose Company Number 3 is a volunteer fire company operating a UHF repeater in the fire radio service at Bristol, Pa. Our funding for replacement of radio equipment is self-generated thru fund raising such as bingo raffles

3. The abolishment of the present Public Safety radio services and the placement of all Public Safety applicants into one pool will short change the Fire Service. If the frequency assignments will be on a first-come-first served basis the volunteer fire companies, who rely on effective communications as well as the metropolitan paid fire departments, will surely take a back seat. As it stands now you can not get the present public safety frequency coordinators to act on a shared service application for the volunteer fire service, even when the frequency is clear in the area requested. The exclusive frequency assignment that is talked about in PR 92-235 is another smack in the face to the "little guy". The large metropolitan agencies, I.E. Philadelphia, PA., will again dominate and control the public safety frequencies and lock out the smaller agencies from licensing on them. This has been and will continue to be a major problem for the volunteer fire service, and is not being addressed in PR Docket 92-235.

4. The only thing I can agree with is the tightening of power output requirements. Whenever the "little guy" applies for a license the coordinators want to restrict their power output to a minimal amount, which if the output power will reliably permit you to saturate your coverage area then there is no problem. However in our area the large metropolitan agencies, who sometimes are co-channelled with us, get a much greater power allocation than necessary, and tend to over ride the "little guy". (I.E. a 25 watt allocation vs a 110 watt allocation for the same geographical coverage area.)

Respectfully submitted,

Goodwill Hose Company # 3  
P.O. Box 2067  
Bristol, PA. 19007

*William J. Ferguson Jr.*

By: William J. Ferguson Jr.  
Title: Communications Officer